

ATTN: International Tax Reform Working Group

Dear Representative Nunes and Blumenaur,

I am writing to ask that the International Taxation Committee of the Ways & Means Committee for Tax Reform seriously consider the ACA proposal for reform to Residency-based taxation RBT. See link:

<http://americansabroad.org/files/6513/6370/3681/finalsbrbtmarch2013.pdf>

As one of nearly 7 million American citizens living, working and voting from abroad, and contributing to the economic growth of the U.S. economy, I believe the current Citizenship based taxation regime must be reformed. Current tax policy is negatively affecting this important sector of American and their ability to compete for jobs, grow the US economy through international business and exports, and live overseas. Current tax policy damages both individuals and the welfare of our country.

The following are some examples of the fallout on Americans working overseas from current U.S. Citizenship based taxation:

- Inability to relocate and work internationally
- Denial of job opportunities or job advancement
- Refusal of entry into business partnerships
- Closure or denial of financial instruments (pensions, insurance policies, bank accounts, etc.)
- Exposure to double taxation or increased tax burden
- Financially ruinous penalties due to broad application of criminal tax evasion regulations on those making simple filing errors due to complexity of the US tax code.

I have been personally affected by this situation in a number of ways. My naturalized mother inherited from her Swiss parents and had Swiss bank accounts as a result. UBS terminated these accounts, and finding a new bank for her mutual funds (non-transferable to the US) while arranging for my terminally ill mother was a nightmare and enormously stressful.

My brokerage account with the Swiss PostFinance Bank (Swiss Federal Government) was also terminated. Additionally I have no tax breaks for retirement savings, because the US taxes my Swiss retirement savings and pension but denies me an IRA. The tax requirements for citizens abroad are so complicated, that I have to pay about 2'000 USD for a tax accountant. This leaves me with little spare income to save, which is especially worrying as the cost of living is high in Switzerland.

This is not the kind of treatment I would expect after 7 years of honorable service in the US Navy.

Please seriously consider the RBT proposal submitted by American Citizens Abroad (ACA). A move towards a residence-based system, like the rest of the world, not only would it be simpler and fairer for Americans living abroad, but it would actually bring in MORE tax revenue than the current system, which wastes compliance resources for very little return. RBT would increase United States exports strongly by facilitating American mobility in the global business environment of today's world.

Yours sincerely,

Samuel Broderick